



November 27, 2001

Ms. Megalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth St., NW
Washington, DC 20554

Re: Ex Parte Presentation
ET Docket No. 98-153: Revision of Part 15 of the Commission's Rules
Regarding Ultra-wideband Transmission Systems

Dear Ms. Salas:

On November 26, 2001, Cynthia Bachman of Kohler Co., David Shafer of D2M Engineering, Kohler Co.'s consulting engineers, as well as Craig Blakeley and Steve Kaminer of this Firm, Kohler Co.'s attorneys, met with Julius Knapp, Michael Marcus, Karen Rackley, and John Reed of the Commission's Office of Engineering & Technology to make an oral ex parte presentation relating to the above-referenced docket.

Kohler made the following points in its presentation:


1. Rules governing ultra-wideband ("UWB") devices should specify technical parameters (such as maximum permissible power levels, bandwidth, etc.) but should not limit the types of applications in which UWB technology may be used; such limits would artificially constrain the potential applications and development of this new technology;
2. Restricting UWB devices to indoor operation would be acceptable to Kohler Co.;
3. Limiting the operation of UWB devices to frequencies above 6 GHz will make it much more expensive to manufacture UWB devices;

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4. Whatever technical standards are adopted should be measurable with equipment generally available at test labs and should be reproducible at different test sites;
5. Non-networked UWB devices should not be required to shut off automatically when not in use;
6. The cumulative effect of UWB devices is the greatest when the devices are synchronized. A number of low power UWB devices operating simultaneously will not present a significant threat of interference if they are not synchronized; and
7. Appropriate transition periods should be provided for devices operated pursuant to a waiver of the rules.

If you have any questions with respect to the foregoing, please do not hesitate to contact the undersigned.

Respectfully submitted,



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Craig J. Blakeley

cc: Julius Knapp
Michael Marcus
Karen Rackley
John Reed